SIDLEY AUSTIN LLP

Thomas R. Califano (24122825) Rakhee V. Patel (00797213) 2021 McKinney Avenue, Suite 2000

Dallas, Texas 75201

Telephone: (214) 981-3300 Facsimile: (214) 981-3400

Email: tom.califano@sidley.com

rpatel@sidley.com

SIDLEY AUSTIN LLP

William E. Curtin (admitted *pro hac vice*)
Patrick Venter (admitted *pro hac vice*)
Anne G. Wallice (admitted *pro hac vice*)

787 Seventh Avenue

Email:

New York, New York 10019 Telephone: (212) 839-5300 Facsimile: (212) 839-5599

> wcurtin@sidley.com pventer@sidley.com

pventer@sidley.com anne.wallice@sidley.com

Attorneys for the Debtors and Debtors in Possession

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re:

PROSPECT MEDICAL HOLDINGS, INC., et al.,1

Debtors.

Chapter 11

Case No. 25-80002 (SGJ)

(Jointly Administered) Rel. to Docket No. 1712

NOTICE OF REVISED PROPOSED ORDER
(I) APPROVING AND AUTHORIZING MANDATORY
CLAIMS RESOLUTION PROCEDURES TO RESOLVE
PROFESSIONAL LIABILITY AND GENERAL LIABILITY
CLAIMS; AND (II) GRANTING RELATED RELIEF

PLEASE TAKE NOTICE THAT beginning on January 11, 2025, the debtors and debtors in possession in the above-captioned chapter 11 cases (the "<u>Debtors</u>") filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Northern District of Texas (the "<u>Court</u>").

PLEASE TAKE FURTHER NOTICE THAT on April 29, 2025, the Debtors filed the Debtors' Motion for Entry of an Order (I) Approving and Authorizing Mandatory Claims Resolution Procedures to Resolve Professional Liability and General Liability Claims; (II) Requiring the Debtors' Insurers to Satisfy Their Obligations Under the Applicable Policies; and

A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at https://omniagentsolutions.com/Prospect. The Debtors' mailing address is 3824 Hughes Ave., Culver City, CA 90232.

- (III) Granting Related Relief [Docket No. 1712] (the "Claims Resolution Procedures Motion"), which attached as Exhibit A thereto a proposed order granting the Claims Resolution Motion [Docket No. 1712-1] (the "Proposed Claims Resolution Procedures Order").
- PLEASE TAKE FURTHER NOTICE that the Debtors hereby file (i) the revised proposed Order (I) Approving and Authorizing Mandatory Claims Resolution Procedures to Resolve Professional Liability and General Liability Claims and (II) Granting Related Relief (the "Revised Proposed Claims Resolution Procedures Order"), attached hereto as Exhibit A, and (ii) a redline of the Revised Proposed Claims Resolution Procedures Order against the Proposed Claims Resolution Procedures Order, attached hereto as Exhibit B.
- **PLEASE TAKE FURTHER NOTICE** that the hearing to consider approval of the Claims Resolution Motion and entry of the Revised Proposed Claims Resolution Procedures Order will be held on <u>May 21, 2025 at 1:30 p.m. (prevailing Central Time)</u> in Courtroom #1, 14th floor, 1100 Commerce Street, Dallas, Texas, 75242 before the Honorable Stacey G.C. Jernigan.
- **PLEASE TAKE FURTHER NOTICE** that copies of the foregoing pleadings may be obtained (i) at the website established by the Debtors' noticing agent, Omni Agent Solutions, Inc., at https://omniagentsolutions.com/Prospect, (ii) from the Court's website https://www.txnb.uscourts.gov via ECF/Pacer, or (iii) upon request to the undersigned.

Dated: May 20, 2025

Dallas, Texas

/s/ Thomas R. Califano

SIDLEY AUSTIN LLP

Thomas R. Califano (24122825) Rakhee V. Patel (00797213) 2021 McKinney Avenue, Suite 2000

Dallas, Texas 75201

Telephone: (214) 981-3300 Facsimile: (214) 981-3400

Email: tom.califano@sidley.com

rpatel@sidley.com

and

William E. Curtin (admitted *pro hac vice*)
Patrick Venter (admitted *pro hac vice*)
Anne G. Wallice (admitted *pro hac vice*)
787 Seventh Avenue
New York, New York 10019

Telephone: (212) 839-5300
Facsimile: (212) 839-5599
Email: wcurtin@sidley.com

peventer@sidley.com anne.wallice@sidley.com

Attorneys for the Debtors and Debtors in Possession

Certificate of Service

I certify that on May 20, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ Thomas R. Califano
Thomas R. Califano